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January 21, 2003

Hon. William M. Nickerson  
United States District Court for the District of Maryland  
Chambers 3C  
101 W. Lombard Street  
Baltimore, Maryland 21201

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Re: Heather Thompson Shai v. COMSYS Information Technology Systems, Inc.  
Civ. No. WMN-02-335

Dear Judge Nickerson:

This letter, which constitutes a joint report of the parties, is being submitted to Your Honor in accordance with the Scheduling Order of January 8, 2003. In that Order, we are directed to report on three matters by January 22, 2003. We do so accordingly.

1) Plaintiff would be interested in pursuing an early settlement/ADR conference. Defendant takes the position that before any such conference occurs, Plaintiff's Motion for Reconsideration and for Leave to Amend, and Defendant's anticipated Opposition thereto, combined with a partial summary judgment motion, should be determined by the Court.

2) Defendant is content to operate within the limitations of 12 deposition hours per side prescribed by the Court, provided that Plaintiff is under a similar directive. Plaintiff seeks 24 deposition hours, which Defendant opposes. However, if Plaintiff receives 24 deposition hours, then Defendant would wish to receive the same.

3) There is not a unanimous request to proceed before a United States Magistrate Judge.

If the Court has any questions, it should direct them to counsel. We thank the Court for its attention.

*20 deposition hours per side*

"APPROVED" "THURS 27<sup>th</sup> DAY  
OF January 2003  
*William J. Gibson*

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I am counsel for the Defendant. Douglas Taylor, Jr., Esq., counsel for the Plaintiff, though his co-counsel Mary Henry, Esq., has directed me to state that he concurs with the substance and form of this letter.

Very truly yours,



Jack L. B. Gohn

cc: Douglas Taylor, Jr., Esq.

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